

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 1:22-cv-24023-SCOLA/GOODMAN**

KENNETH C. GRIFFIN,

Plaintiff,

v.

INTERNAL REVENUE SERVICE and U.S.
DEPARTMENT OF THE TREASURY,

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26 and Magistrate Judge Goodman's Post-Discovery Hearing Administrative Order (ECF No. 84 at 2–3), Plaintiff Kenneth C. Griffin and Defendants Internal Revenue Service and U.S. Department of the Treasury respectfully move this Court for entry of a Stipulated Protective Order to govern the disclosure and use of confidential information, documents, deposition testimony, and/or materials produced in the course of this litigation by the Parties or by third parties. The proposed Stipulated Protective Order is attached as Exhibit A.

Discovery in this case is ongoing. Each Party has sought discoverable material from the other, and Plaintiff has sought material from third parties. As discovery continues, information may arise that is personally identifying or financial in nature, contains proprietary business information, or otherwise should be kept confidential. The Stipulated Protective Order is reasonably necessary to protect such sensitive and confidential information. The Parties have conferred and agreed to the text of the Stipulated Protective Order. The Parties agree that the

Protective Order will govern discovery in this matter and will supplement the Southern District of Florida's Local Rules and the Federal Rules of Civil Procedure.

Courts have "broad discretion" to enter orders to protect confidential information. *See Wreal LLC v. Amazon.com, Inc.*, No. 14-21385-CIV-LENARD/GOODMAN, 2014 WL 12160650, at *3 (S.D. Fla. Nov. 14, 2014). Accordingly, the Parties respectfully request that the Court grant the Parties' Joint Motion for Entry of Stipulated Protective Order and enter the proposed Stipulated Protective Order attached hereto as Exhibit A.

Dated: January 4, 2024

Respectfully submitted,

For Plaintiff

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 4th day of January, 2024 I filed a copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will send notification to all counsel of record.

By: /s/ Jason D. Sternberg
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